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Presentment Date and Time: March 10, 2023 at 12:00 p.m. (Eastern)
Objection Deadline: March 9, 2023 at 5:00 p.m. (Eastern)

Counsel for Jonathan L. Flaxer, Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
JOSEPH KLAYNBERG,	:	Case No. 22-10165 (MG)
	:	
Debtor.	:	
	:	
-----X		

**NOTICE OF PRESENTMENT OF ORDER TO 11 U.S.C. §§ 327(A) AND 328(A) OF THE
BANKRUPTCY CODE AND FED. R. BANKR. P. 2014(A) AND 2016 AUTHORIZING
THE RETENTION OF KEEN-SUMMIT CAPITAL PARTNERS LLC AS BROKER FOR
THE CHAPTER 11 TRUSTEE *NUNC PRO TUNC* TO FEBRUARY 2, 2023**

PLEASE TAKE NOTICE that, Jonathan L. Flaxer, chapter 11 trustee (the “**Trustee**”) for the estate of the above-captioned debtor (the “**Debtor**”), will present the proposed Order, annexed to the Application as **Exhibit C**, pursuant to § 327(a) and 328(a) of title 11 of the United States Code (as amended, the “**Bankruptcy Code**”) and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), authorizing the retention of Keen-Summit Capital Partners LLC as broker to the Trustee *nunc pro tunc* to February 2, 2023, for signature to the Honorable Martin Glenn, Chief United States Bankruptcy Judge of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **March 10, 2023 at 12:00 noon (prevailing Eastern Time)** in accordance with Local Bankruptcy Rule 9074-1(b).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Order must be in

writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefor, and must be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers of the Honorable Martin Glenn), and any objection must further be served upon: (i) Golenbock Eiseman Assor Bell & Peskoe LLP, Proposed Counsel for the Trustee, 711 Third Avenue, 17th Floor, New York, New York 10017 (Attn: Michael S. Weinstein, Esq.); (ii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Tara Tiantian, Esq.); and (iii) all other parties entitled to service in the above-captioned cases, so as to be received no later than **March 9, 2023 at 5:00 p.m. (prevailing Eastern Time). Unless objections are received by that time, there will not be a hearing, and the proposed Order may be signed.**

Dated: New York, New York
February 21, 2023

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By: /s/ Michael S. Weinstein
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